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BRIDGESTONE/FIRESTONE, INC.

May 3, 1991

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Ms. Debbie Rossi
U.S. Environmental
Protection Agency
Region III
841 Chestnut Street
Philadelphia, PA

Dear Ms. Rossi:

Bridgestone/Firestone ("Firestone") has reviewed the report submitted by ERM on behalf of Cecil County with the results from ERM's investigation of the Woodlawn Transfer Station Septic System located next to the Woodlawn Landfill Site. Firestone, of course, is concerned with the impact, if any, of the Septic System on the Landfill Site. In that regard, we offer the following comments and observations for your consideration.

First, the report contains implications about contaminant sources that are inconsistent with the available data. For example, the executive summary of the report suggests that chemicals found in the groundwater at the septic tank monitoring well, TSW-1 (which was installed as part of the Transfer Station Septic System study), may come from cells B and C of the Landfill. The only basis for this suggestion is that the septic tank well may be downgradient from cells B and C. However, previously collected chemical data from the groundwater appear to rule out cells B and C as a source. Well F5, which is much closer than TSW-1 to cells B and C, and is clearly downgradient from cells B and C, does not contain the mix of chemicals found in TSW-1.

Also, the report observes that chemicals found in TSW-1 also are found in some wells on the Landfill Site. This is true. However, it is also true that some of the chemicals in TSW-1 were found in the septic tank sample, but not in the F-series wells which are immediately upgradient of the Transfer Station.

Second, we do not believe that the report has fully addressed the possibility that chemicals from the Transfer Station may have affected or be affecting the Landfill Site. The basic conclusion of the report is that, because no consistent soil contamination was found under the drainfield, the Transfer Station could not have affected groundwater. We feel that questions remain, however, particularly concerning soil that

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emitted organic vapors detected during the field work at and above the drainfield, and concerning the effect of septic tank overflows onto the surface during periods when the drainfield was plugged. More specifically, we note the following:

1. The report addresses only the drain field of the Transfer Station. The septic tank overflowed for some unknown length of time. Did this overflow of contaminated material (from the septic tank analysis) contaminate the shallow soils above the drain field or did it run on the surface onto the Landfill Site?
2. PID readings that were reported in the boring logs as high as 29.8 PPM were observed in the shallow soil above the drain field. What is the extent and type of contamination? Is it influencing the groundwater?
3. The boring logs do not make clear whether the soil borings penetrated the drain field itself or the natural sand and gravel.
4. Where did the contamination in the septic tank well originate? The contamination in the septic tank well is different than the F-series wells that are upgradient.
5. Where did the contamination from the septic system go over the years? The results from the sludge indicate several hazardous constituents that must have been soluble in the water and gone out into the drain field or through the overflow.
6. The report states that no chemicals have been used in the past four years to clean the drain field. What was used before that (the Transfer Station has been in operation for more than 10 years) and in what quantity? What happened to it?

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We appreciate your review of these comments. Please call if you have any questions.

Sincerely,

George B. Markert
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Senior Environmental Consultant

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